

MAY 02 2000

Mr. Geoff Jones  
Corporate project Manager  
Safety-Kleen Corporation  
P.O. Box 11393  
Columbia, SC 29211

Dear Mr. Jones:

RE: Safety-Kleen Wichita Facility, 2549 N. New York St., Wichita, Kansas  
EPA ID# KSD007246846

The United States Environmental Protection Agency (EPA) and the Kansas Department of Health and Environment (KDHE) have reviewed the document entitled *Ground Water Monitoring Work Plan Addendum, Safety-Kleen (Wichita) Facility, Wichita, Kansas* (Work Plan Addendum) dated April 4, 2000. This letter documents the EPA's and KDHE's comments in response to review of the Work Plan Addendum. The following comments must be satisfactorily addressed prior to installation of the proposed monitoring wells.

1. The text indicates that proposed wells SK-5(S&D) and SK-4(S) are intended to monitor potential source areas. EPA and KDHE are not aware of a potential source in the vicinity of SK-4; however, SK-3 is proposed near an apparent source area. Please confirm which wells are proposed to monitor potential source areas.
2. The proposed location for monitoring well SK-5 is in the vicinity of soil boring location B-22; however, analytical data from soil boring location B-21 is more indicative of a source area than B-22. EPA and KDHE request that the proposed location for SK-5 be relocated to the vicinity of B-21.
3. It is difficult to interpret the EC logs without knowing what units the relative electrical conductivity and relative hammer speed are presented in, or whether the scale of the units is consistent between borings. Also, there is no indication that the boring locations were surveyed and therefore, it is unclear how the elevation above mean sea level was determined for the cross-sections. Please submit copies of the original EC logs with the units of measurement for review, and clarify how the elevations for the cross-sections were determined.
4. The proposed well constructions are based on interpretation of the electrical conductivity (EC) logs. Please note, the interpretation of the EC logs is hypothetical and all interpretations are tentative until the electrical response is correlated/calibrated with site specific geologic logs. Therefore, EPA and KDHE require that the wells proposed for

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geologic logging be installed first. The EC logs and geologic logs shall be field correlated prior to proceeding with installation of the other wells. Actual well constructions should be modified as necessary based on the log correlation. Any significant changes should be discussed with EPA or KDHE project managers.

5. Safety-Kleen has interpreted the EC log for boring EB3 as showing a clay lens at approximately 25 feet below land surface. The electrical conductivity response at this depth is similar to other responses in EB3 within the interval interpreted to be a sand. Based on this information and the lack of the apparent clay lens (interpreted by EC log) in boring EB2, it is unclear whether the geologic unit interpreted as a clay on the eastern side of the site extends to the northwestern side of the facility. Therefore, EPA and KDHE request continuous logging of SK-6(D), in addition to the continuous logging proposed for SK-1D and SK-3D, in order to adequately interpret the site geology.
6. Safety-Kleen has proposed abandoning monitoring wells UPRR-1, UPRR-2, RSC-1, and HRI-02, three of which are east of 25<sup>th</sup> Street. EPA and KDHE agree that wells that are damaged and/or improperly screened for the sampling purposes of the site should be abandoned; however, abandoning the three wells east of 25<sup>th</sup> Street without replacement, will not provide an adequate ground water elevation monitoring network on the east side of the facility. An additional monitoring well will be required in the northeast corner of the facility, in order to help evaluate the effects of Chisolm Creek on the groundwater gradient. Monitoring well RSC-1 should be retained, at least temporarily, for ground water elevation measurements. Abandonment of UPRR-1 and UPRR-2 is approved based on their damaged condition. Please note, however, that a replacement well pair will probably be necessary in this vicinity in the future. Abandonment of HRI-02 is also approved.

Please address the comments above in a letter response. Attach the requested EC logs and a figure showing the requested revisions or additions to monitoring well locations. Also include a proposed schedule for field work. A fully revised Work Plan Addendum document will not be required at this time because the data presented in this document is considered preliminary and should be included in final form in the investigation report. If you have any questions, please call me at (913) 551-7547, or Christine Jump at (785) 296-1935.

Sincerely,

William F. Lowe, RPG  
Unit leader, ARTD/RCAP  
RCRA Corrective Action and Permits Branch

cc: Ms. Kay Tauscher, Safety-Kleen  
Christine R. Jump, KDHE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

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